

THE HONORABLE THOMAS S. ZILLY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JILLIAN HORMAN, an individual,

Plaintiff,

v.

SUNBELT RENTALS, INC., *et al.*,

Defendants.

Case No. 2:20-cv-00564-TSZ

**DECLARATION OF ADA K. WONG
IN SUPPORT OF PLAINTIFF'S
SECOND MOTION TO COMPEL
DISCOVERY RESPONSES**

I, Ada K. Wong, declare,

1. I am an attorney of record for Plaintiff Jillian Horman in this matter and make the following statements based on my personal knowledge.

2. On January 12, 2021, Plaintiff served Sunbelt with Plaintiff's Second Set of Requests for Production to Defendant Sunbelt Rentals, Inc. ("Plaintiff's Second Requests"). Attached hereto as **Exhibit A** is a true and correct copy of Plaintiff's Second Requests.

3. On February 11, 2021, Defendant Sunbelt Rentals, Inc. ("Sunbelt") served Answers and Objections to Plaintiff's Second Requests. Attached hereto as **Exhibit B** is a true and correct copy of Sunbelt's Answers and Objections to Plaintiff's Second Requests.

1 4. Attached hereto as **Exhibit C** is a true and correct copy of my February 23, 2021 letter
2 to Sunbelt's counsel detailing deficiencies with Sunbelt's Answers and Objections to Plaintiff's
3 Second Requests.

4 5. Counsel for Sunbelt and I met and conferred via telephone conference on February 26,
5 2021, and then agreed to continue the conference on March 4, 2021. Attached hereto as **Exhibit D** is
6 a true and correct copy of my February 26, 2021 letter summarizing the February 26, 2021 discovery
7 conference.

8 6. On March 4, 2021, counsel for Sunbelt and I resumed and completed our discovery
9 conference that began on February 26, 2021. Attached hereto as **Exhibit E** is a true and correct copy
10 of my March 4, 2021 letter summarizing the March 4, 2021 discovery conference.

11 7. Attached hereto as **Exhibit F** is a true and correct copy of my March 18, 2021 letter to
12 Sunbelt's counsel detailing deficiencies with Sunbelt's Answers and Objections to Plaintiff's Second
13 Requests.

14 8. Attached hereto as **Exhibit G** is a true and correct copy of Sunbelt's counsel's March
15 29, 2021 letter summarizing its view of the discovery conferences.

16 9. Attached hereto as **Exhibit H** is a true and correct copy of my April 5, 2021 letter
17 responding to Sunbelt's March 29, 2021 letter with further clarifications and corrections.

18 10. Attached hereto as **Exhibit I** is a true and correct copy of Sunbelt's counsel's April 8,
19 2021 letter further summarizing its view of the discovery conferences.

20 11. Attached hereto as **Exhibit J** is a copy of the chart summarizing Plaintiff's Second
21 Requests, Defendant's objections and answers, and meet and confer efforts for ease.

22 12. Attached hereto as **Exhibit K** is a true and correct copy of Defendant's Bates No.
23 SB/Horman-DEF01316, produced by Defendant in the course of discovery.

1 13. Attached hereto as **Exhibit L** is a true and correct copy of Defendant's Bates Nos.
2 SB/Horman-DEF00432-SB/Horman-DEF00433, produced by Defendant in the course of discovery.

3 14. Attached hereto as **Exhibit M** is a true and correct copy of Defendant's Bates No.
4 SB/Horman-DEF00168, produced by Defendant in the course of discovery.

5 15. Attached hereto as **Exhibit N** is a true and correct copy of Defendant's Bates No.
6 SB/Horman-DEF01339, produced by Defendant in the course of discovery.

7 16. Attached hereto as **Exhibit O** is a true and correct copy of the relevant pages of
8 Defendant's Response to Plaintiff's Third Set of Requests for Admission.

9 17. The parties met and conferred over telephone on February 26, 2021 and March 4, 2021
10 regarding Defendant Sunbelt's responses to Plaintiff's Second Requests. On February 26th, Plaintiff's
11 counsel Isabel S. Johnson and I conferred with defense counsel Yash B. Dave and Patricia J. Hill. On
12 March 4th, Ms. Johnson and I conferred with Mr. Dave and Ian M. Jones.

13 18. Attached hereto as **Exhibit P** is a true and correct copy of Sunbelt's counsel's March
14 12, 2021 letter summarizing its view of the March 4, 2021 conference.

15 I declare under penalty of perjury under the laws of the State of Washington that the foregoing
16 is true and correct and is based upon my personal knowledge.

17 **DATED** April 15, 2021, at Mountlake Terrace, Washington.

18
19 /s/ Ada K. Wong

Ada K. Wong, WSBA #45936

CERTIFICATE OF SERVICE

I hereby certify that on April 15, 2021, I caused to be electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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Co-Counsel for Plaintiff

I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

DATED: April 15, 2021, at Mountlake Terrace, Washington.

/s/ Kaila A. Eckert
Kaila A. Eckert